

CENTER FOR DISABILITY ACCESS
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ADAM GHADIRI,

Plaintiff,

v.

**CARPET AND LENOLEUM
CITY**, a business entity;
CHAD BOUCE; an individual;
BRUCE HAWKINS, an individual;
JACQUELINE COX as trustee of
Jacqueline M. Cox Trust, an
individual;

Defendants

Case: 8:18-CV-01869-AG-ADS

**Declaration of Adam Ghadiri in
Support of his Motion for
Summary Judgment**

1. I, the undersigned, am the Plaintiff in this case. Based upon my own experience and knowledge, I can competently testify to the following:
2. I suffer from severe arthritis in my knees and back. I have been diagnosed with spinal stenosis, neuropathy, and nerve damage.
3. I have difficulty walking and use a cane for mobility. I also sometimes use a walker, wheelchair, or mobility scooter for long

1 distances.

2 **4.** I suffer daily with pain that requires me to take pain medication.

3 **5.** I have a California driver's license and drive for business activities
4 and for my household errands. I have a California handicap parking
5 placard that is prominently displayed on my vehicle.

6 **6.** In September, 2018, I went to the Carpet and Linoleum City, located
7 at 1204 S. Redondo Ave., Long Beach, CA 90804, ('Store') to shop.

8 **7.** Attached as Exhibit '3' is a business card I received on my visit to
9 the Store in September, 2018.

10 **8.** As I drove into the parking lot of the Store, I saw that there was
11 parking provided for customers.

12 **9.** However, I did not find any space designated for use by persons with
13 disabilities.

14 **10.** I did not find any parking space with an adjacent access aisle, no
15 signage indicating disabled parking, no "NO PARKING" lettering
16 in any space, and no International Symbol of Access in any space.

17 **11.** I need a parking space with an access aisle to ensure I have enough
18 room to get in and out of my vehicle. I was anxious to park in the
19 parking lot of the Store because I was afraid that another car would
20 park next to me, preventing me from re-entering my vehicle.

21 **12.** I have faced this problem many times in the past where there was no
22 properly marked accessible parking space, and then was trapped out
23 of my vehicle when another car parked next to me.

24 **13.** Due to the lack of an accessible parking space, I was forced to park
25 in a non-disabled parking space few feet away from the Store, and
26 had to walk it up to the Store.

27 **14.** This caused me difficulty, discomfort, and frustration.

28 **15.** The photographs submitted as Exhibit "4" are true and accurate

1 copies of the photographs taken by me at the Store on the date of my
2 visit in September, 2018.

3 **16.**I travel to Los Angeles County often to eat, shop, and visit friends
4 on a regular and ongoing basis. I drive through the Long Beach area
5 where the Store is located.

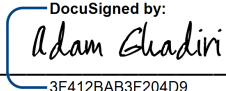
6 **17.**The Store is therefore a convenient place for me to stop by and shop
7 for carpets.

8 **18.**I would like the ability to safely and independently park and access
9 Store.

10 **19.**Once the violations are removed, I plan to visit the Store on a regular
11 basis whenever the need arises.

12 **20.**I declare under penalty of perjury under the laws of the State of
13 California and the United States that the foregoing is true and
14 correct.

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16 Dated: 5/20/2019

17 By: 
18 Adam Ghadiri
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